

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

Jane Doe, individually and on behalf of all  
others similarly situated,

Plaintiffs,

Civil Action No.1:14-cv-12813

V.

Deval L. Patrick, Governor of the  
Commonwealth of Massachusetts;  
Massachusetts Department of Correction; Luis  
S. Spencer, Commissioner of the Massachusetts  
Department of Correction; and Lynn  
Bissonnette, Superintendent of the  
Massachusetts Correctional Institution at  
Framingham,

Defendants.

## Oral Argument Requested

### MOTION FOR LEAVE TO PROCEED PSEUDONYMOUSLY

Upon the accompanying Memorandum of Law and Proposed Order, Plaintiff hereby moves this Court for an Order granting her leave to proceed in this case under a pseudonym to prevent the public disclosure of her mental health status.

## REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Plaintiff respectfully requests that the Court hold oral argument on this motion.

**CERTIFICATION WITH RESPECT TO LOCAL RULE 7.1(A)(2)**

Because Defendants' counsel have not yet been served with the complaint, and have thus not appeared, counsel have not been able to formally meet and confer regarding this motion.

However, Plaintiff's counsel has discussed the motion with William Saltzman , Senior Litigation Counsel for the Massachusetts Department of Correction. Mr. Saltzman stated that the Department of Correction did not intend to object to Plaintiff's Motion to Proceed Pseudonymously. Plaintiff's counsel will formally meet and confer with Defendants' counsel regarding this motion upon their appearance.

Dated: July 1, 2014

Respectfully submitted,

/s/ William F. Lee

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon each party below by mail on July 1, 2014.

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